

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

13 CR 574

UNITED STATES OF AMERICA

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CRIMINAL NO.

United States District Court
Southern District of Texas
FILED

vs.

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JAMAL DEVANTE CRISS,

ULYSSEUS TEDRICK MCGEE,

SHAQUINN HILSTOCK,

DARWIN LAKEET JOYCE,

Defendants.

§

SEP 5 2013

David J. Bradley, Clerk of Court

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment, Radio Shack maintains stores throughout the United States, and was engaged in the business of the sale of consumer electronics and cellular telephones which had traveled in interstate commerce, and which affected interstate commerce.

COUNT ONE

Conspiracy to Interfere with Commerce by Robbery

On or about January 12, 2013, in the Houston Division of the Southern District of Texas,

JAMAL DEVANTE CRISS,
ULYSSEUS TEDRICK MCGEE,
SHAQUINN HILSTOCK, and
DARWIN LAKEET JOYCE,

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and others known and unknown to the Grand Jury, to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Sections 1951(b)(1) and (b)(3), in that the defendants did unlawfully combine, conspire, confederate, and agree with each other, to unlawfully take and obtain property, namely, consumer electronics, to include cellular telephones, and United States currency, which was in the possession and custody of an employee of the Radio Shack, located at 1018 Gessner Road, Houston, Texas, by means of actual and threatened force, violence, and fear of injury to employees of said store; in violation of Title 18, United States Code, Section 1951(a).

MANNER AND MEANS

The unlawful conspiracy was accomplished in the following manner and means:

1. It was part of the conspiracy that co-conspirators discussed plans to rob the Radio Shack store located at 1018 Gessner Road, Houston, Texas.

2. It was further part of the conspiracy that a co-conspirator would drive a vehicle back and forth across the road in front of the store and act as a look out.
3. It was further part of the conspiracy that a co-conspirator would drive a vehicle to the vicinity of the front of the store, allow co-conspirators to exit the vehicle and then park behind the store, after which he would wait for co-conspirators to re-enter the vehicle after the robbery and then drive them all away.
4. It was further part of the conspiracy that three co-conspirators would enter the Radio Shack store at 1018 Gessner Road, Houston, Texas, control the persons inside of the store through the display of a firearm, and then take consumer electronics, to include cellular telephones, and cash.
5. It was further part of the conspiracy that co-conspirators would divide the proceeds from the robbery of the Radio Shack store at 1018 Gessner Road, Houston, Texas amongst themselves.

OVERT ACTS

In furtherance of this conspiracy, and in order to effect and accomplish its objectives, one or more of the defendants

committed the following overt acts in the Southern District of Texas:

1. On or about January 12, 2013, ULYSSEUS TEDRICK MCGEE drove a vehicle back and forth across the road in front of the Radio Shack at 1018 Gessner Road, Houston, Texas.
2. On or about January 12, 2013, SHAQUINN HILSTOCK drove a vehicle to the vicinity of the front of the Radio Shack at 1018 Gessner Road, Houston, Texas.
3. On or about January 12, 2013, SHAQUINN HILSTOCK drove that same vehicle to the back of the store to wait for the return of his co-conspirators so that he could drive them away.
4. On or about January 12, 2013, at the Radio Shack located at 1018 Gessner Road, Houston, Texas, JAMAL DEVANTE CRISS, DARWIN LAKEET JOYCE, and an unindicted juvenile co-conspirator entered the store displaying a firearm, to wit: a handgun.
5. On or about January 12, 2013, SHAQUINN HILSTOCK drove JAMAL DEVANTE CRISS, away from the Radio Shack located at 1018 Gessner Road, Houston, Texas.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

Conspiracy to Use or Carry a Firearm During and in
Relation to a Crime of Violence

On or about January 12, 2013, in the Houston Division of
the Southern District of Texas, and elsewhere,

JAMAL DEVANTE CRISS,
ULYSSEUS TEDRICK MCGEE,
SHAQUINN HILSTOCK, and
DARWIN LAKEET JOYCE,

defendants herein, did knowingly and intentionally agree,
combine, conspire and confederate with each other and others
known and unknown to the Grand Jury, to knowingly carry and
brandish a firearm, during and in relationship to a crime of
violence, for which they may be prosecuted in a court of the
United States, that being Conspiracy to Interfere with Commerce
by Robbery.

In violation of Title 18, United States Code, Section
924(o).

Notice of Criminal Forfeiture

Pursuant to Title 18, United States Code, §§ 924(d)(1), the United States of America hereby gives notice that all firearms and ammunition involved in, or used in the commission of the offense in violation of Title 18, United States Code, § 924(o) charged in Count Two are subject to forfeiture, including, but not limited to, the following:

1. a Smith & Wesson .38 caliber revolver, model 36, serial number AFW3452.

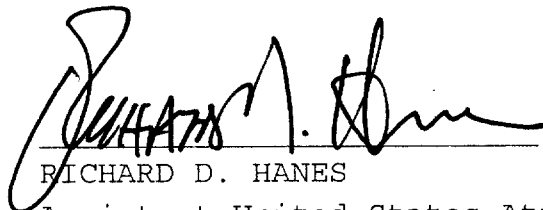
A TRUE BILL:

Original Signature on File

~~FOREMAN~~ OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney

BY:

A handwritten signature in black ink, appearing to read "Richard D. Hanes", is written over a horizontal line.

RICHARD D. HANES
Assistant United States Attorney